IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

ING BANK N.V.,	§
	§
Plaintiff	§
	§
v.	§
	§ CIVIL ACTION NO. 2:15-cv-117
M/V MARIA CRISTINA RIZZO, IMO	§ ADMIRALTY
No. 9448592, her engines, tackle,	§
equipment, furniture, appurtenances,	§
etc., in rem	§
,	§
Defendant	§

MOTION TO RELEASE VESSEL FROM ARREST

NOW COMES, Plaintiff ING Bank N.V., through undersigned counsel, and in accordance with this Court's March 20, 2015 Order (Doc. 4) ordering the issuance of a Warrant of Arrest pursuant to Admiralty Rule C, files this motion for entry of an Order releasing the M/V MARIA CRISTINA RIZZO (IMO No. 9448592), and her engines, tackle, equipment, furniture, appurtenances, etc. (hereafter "RIZZO") from arrest and / or seizure on the following grounds:

- 1. The only party to this admiralty action at present is ING Bank N.V., who consents to the release of the RIZZO from arrest and / or seizure; and,
- 2. This Court has not entered any Order to the contrary preventing or otherwise restricting the foregoing release from arrest and / or seizure of the RIZZO.

WHEREFORE, ING Bank N.V. requests this Court enter an Order releasing the M/V MARIA CRISTINA RIZZO (IMO No. 9448592), and her engines, tackle, equipment, furniture, appurtenances, etc. from arrest and / or seizure.

Respectfully submitted:

/s/ John D. Padgett

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and

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Attorneys for ING Bank N.V.

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of March, 2015, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system.

/s/ John D. Padgett JOHN D. PADGETT (VSB # 23087) McGuire Woods LLP 101 W. Main Street, Suite 9000 Norfolk, VA 23510 Telephone: 757-640-3779

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